

**IN THE DISTRICT COURT OF THE UNITED STATES  
OKLAHOMA EASTERN DISTRICT**

<b>GREAT LAKES INSURANCE SE,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No.: CIV-23-52-JAR</b>
<b>vs.</b>	)	
	)	<b>6:23-CV-00052-JAR</b>
<b>WAGNER &amp; LYNCH, PLLC,</b>	)	
	)	<b>Hon. Jason A. Robertson</b>
<b>Defendant.</b>	)	
	)	

**PLAINTIFF GREAT LAKES INSURANCE SE'S HYBRID/EXPERT DISCLOSURES**  
**UNDER FRCP 26(a)(2)**

Pursuant to Federal Rule of Civil Procedure 26(a)(2), and according to Kumho Tire Co., Ltd. et al. v. Carmichael et al., 526 U.S. 137 (1999), Defendant Wagner & Lynch, PLLC discloses the following information:

**1. Identity of witnesses that Plaintiff may use at trial to present evidence under Federal Rule of Evidence 702, 703, or 705:**

- a) Representative of Superior Plumbing, 1474 Blackberry Road Indianola, OK 74442;
- b) Representative of FloodServ, 201 W Cherokee Ave. McAlester, OK 74501;
- c) Representative of Baytown Construction, LLC P.O. Box 375 Crowder, OK 74430.

**2. Subject matter on which the above witnesses are expected to present evidence under Federal Rule of Evidence 702, 703, or 705:**

In addition to presenting factual testimony relevant to the claim, each witness may also opine as to the general accepted practices in their respective fields (plumbing, remediation, and construction respectively). This includes cost estimates, facts, and data used to conclude what actions each witness took in respect to this claim.

**3. Summary of the facts and opinions to which the witnesses are expected to testify:**

In addition to presenting factual testimony relevant to the claim, each witness may also opine as to the general accepted practices in their respective fields (plumbing, remediation, and construction). This includes cost estimates, facts, analyses, and data used to conclude what actions each witness took in respect to this claim. These witnesses have not been specifically retained to provide expert testimony, therefore no written expert report is required.

DATED this 8th day of June, 2023.

Respectfully submitted by:



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**CERTIFICATE OF SERVICE**

I CERTIFY that on this 8th day of June, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notifications to the following:

Michael Linscott, OBA #17266  
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*Attorneys for Plaintiff*

I CERTIFY that on this 8th day of June, 2023, I sent the foregoing to the following individuals without the use of the CM/ECF system, via U.S. Mail, all postage pre-paid:

NONE.

  
*Attorney for Defendant*